

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

v.

AHMAD JAMEL BRITTON,  
JAMES CLARK,  
TRAMAINÉ JAMAL ELLIS,  
TRAY FERGUSON, and  
RICKY TURNER,

Defendants.

Case No.: 4:13CR00146CDP

**INDICTMENT**

**COUNT ONE**

The Grand Jury charges that:

On or about April 2, 2013, in the City of Saint Louis, within the Eastern District of Missouri,

**AHMAD JAMEL BRITTON**

the defendant herein, did knowingly and intentionally distribute a mixture or substance containing 28 grams or more of a detectible amount of cocaine base (crack), a Schedule II narcotic controlled substance drug.

All in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

**COUNT TWO**

The Grand Jury further charges that:

Beginning on or about April 2, 2013, and continuing to on or about April 10, 2013, with the exact dates unknown to the federal grand jury, within the Eastern District of Missouri and elsewhere,

**AHMAD JAMEL BRITTON,  
JAMES CLARK,  
TRAMAINE JAMAL ELLIS,  
TRAY FERGUSON, and  
RICKY TURNER**

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree, with each other and other persons both known and unknown to the federal grand jury, to commit an offense against the United States, to wit: to knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of cocaine, a Schedule II narcotic controlled substance drug.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(ii)(I).

**COUNT THREE**

The Grand Jury further charges that:

Beginning on or about April 2, 2013, and continuing to on or about April 10, 2013, with the exact dates unknown to the federal grand jury, within the Eastern District of Missouri and elsewhere,

**AHMAD JAMEL BRITTON,  
JAMES CLARK,  
TRAMAIN JAMAL ELLIS,  
TRAY FERGUSON, and  
RICKY TURNER**

the defendants herein, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the federal grand jury, during and in relation to the drug-trafficking crime charged in Count Two, to possess one or more firearms in furtherance of the drug-trafficking crime charged in Count Two.

All in violation of Title 18, United States Code, Section 924(o).

**COUNT FOUR**

The Grand Jury further charges that:

On or about April 10, 2013, in the City of Saint Louis, Missouri, within the Eastern District of Missouri,

**JAMES CLARK,  
TRAY FERGUSON, and  
RICKY TURNER**

the defendants herein, acting with others, during and in relation to the drug-trafficking crime named in Count Two, did knowingly possess one or more firearms in furtherance of the drug-trafficking crime charged in Count Two herein.

In violation of Title 18, United States Code, Sections 924(c)(1)(A).

A TRUE BILL.

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FOREPERSON

RICHARD G. CALLAHAN  
United States Attorney

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THOMAS REA, #53245MO  
Assistant United States Attorney